

STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT

JEREMY J. ROMERO,

Plaintiff,

V.

Cause No.: D-101-CV-2013-01921

SGT. FRED JASLER, DIRECTOR
BILL HUBBARD, and THE SPECIAL
INVESTIGATIONS DIVISION of the
DEPARTMENT OF PUBLIC SAFETY,

Defendants.

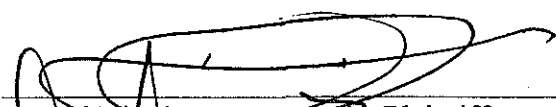
MEDIATION AGREEMENT

COMES NOW, the Parties, by and through their attorneys of record, and hereby state that on September 29, 2015, they participated in Mediation with Denise Torres. The parties have come to the agreement of Nine Hundred Thousand Dollars and No Cents (\$900,000.00) as full and final settlement for all claims, whether known or unknown as of the date of entering this agreement, against all Defendants ever named in this action and their agents, employees, and representatives. As part of the settlement, Plaintiff also agrees that he will not reapply and/or seek employment within the New Mexico State Government in any capacity. The parties agree to the confidentiality provisions of New Mexico law (NMSA 15-7-9).

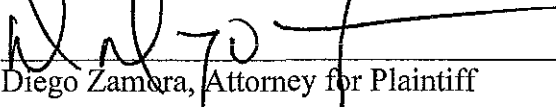
Defendant will make payment within thirty (30) working days from Plaintiff executing a full and final release in the form provided by Defendant, such release to include indemnification of all outstanding liens and subrogation including workers compensation. Further, Plaintiff's counsel will sign an order of dismissal with prejudice to be prepared by defense counsel.

The mediation fee will be split two ways.

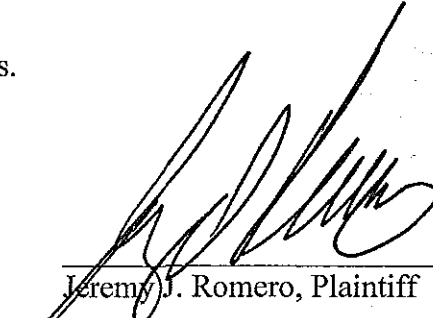
Dated: September 29, 2015



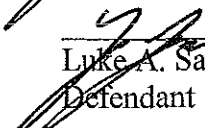
Rachel Higgins, Attorney for Plaintiff



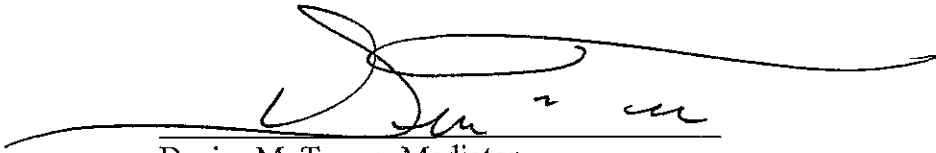
Diego Zamora, Attorney for Plaintiff



Jeremy J. Romero, Plaintiff



Luke A. Salganek, Attorney for
Defendant

A handwritten signature in black ink, appearing to read 'Denise M. Torres', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail that extends to the right.

Denise M. Torres, Mediator